1 COOLEY LLP COOLEY LLP TIANA DEMAS* ROBBY L.R. SALDAÑA* 2 (tdemas@cooley.com) (rsaldana@cooley.com) **KEVIN T. CARLSON*** 1299 Pennsylvania Avenue, NW, Suite 700 (ktcarlson@cooley.com) 3 Washington, D.C. 20004-2400 110 N. Wacker Drive, Suite 4200 Telephone: +1 202 842 7800 4 Chicago, IL 60606-1511 +1 202 842 7899 Facsimile: Telephone: +1 312 881 6500 5 Facsimile: +1 312 881 6598 6 KRISTINE A. FORDERER (278745) (kforderer@cooley.com) 7 KYLE C. WONG (224021) (kwong@cooley.com) 8 3 Embarcadero Center, 20th Floor San Francisco, California 94111-4004 9 +1 415 693 2000 Telephone: +1 415 693 2222 Facsimile: 10 Attorneys for Defendant Roblox Corporation 11 (*Admitted *Pro Hac Vice*) 12 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 13 SAN FRANCISCO DIVISION 14 Case No. 3:23-cv-04146-VC RACHELLE COLVIN, individually and as 15 next friend of minor Plaintiff, G.D., 16 JOINT STIPULATION AND [PROPOSED] DANIELLE SASS, individually and as next **ORDER ADJOURNING PRIVATE MEDIATION** friend of minor plaintiff, L.C., DAVID L. 17 **DEADLINE PURSUANT TO CIVIL LOCAL** GENTRY, individually and as next friend of **RULE 6-2** minor plaintiff, L.G., OSMANY 18 RODRIGUEZ, individually, and as next friend Judge: Hon. Vince Chhabria 19 of minor plaintiff, O.R., JOSHUA R. MUNSON, individually and as next friend of 20 minor plaintiffs D.C., J.M., T.T., and R.T, and LAVINA GANN, individually and as next 21 friend of minor plaintiff, S.J., and on behalf of all others similarly situated, 22 Plaintiffs, 23 v. 24 ROBLOX CORPORATION, SATOZUKI 25 LIMITED B.V., STUDS ENTERTAINMENT LTD., and RBLXWILD ENTERTAINMENT 26 LLC. 27 Defendants. 28

COOLEY LLP ATTORNEYS AT LAW SAN FRANCISCO

STIPULATION

Pursuant to Civil Local Rule 6-1(b), Plaintiffs RACHELLE COLVIN, individually and as next friend of minor Plaintiff, G.D.; DANIELLE SASS, individually and as next friend of minor plaintiff, L.C.; DAVID L. GENTRY, individually and as next friend of minor plaintiff, L.G.; OSMANY RODRIGUEZ, individually, and as next friend of minor plaintiff, O.R.; and LAVINA GANN, individually and as next friend of minor plaintiff, S.J.; and Plaintiffs on behalf of all others similarly situated; and Defendant Roblox Corporation, by and through their attorneys of record, hereby stipulate as follows:

WHEREAS, on April 18, 2024, the Court ordered the parties to complete private mediation by August 16, 2024 (Dkt. 78).

WHEREAS, notwithstanding that Roblox Corporation filed a motion to dismiss Plaintiffs' Consolidated Class Action Complaint on May 14, 2024 (Dkt. 87), the parties have been participating in discovery and are proceeding toward initial and rebuttal class certification expert disclosure deadlines. *See* Ex. 1 ¶ 4 (Decl. K. Wong).

WHEREAS, the parties have not previously requested extension of the August 16, 2024 deadline to complete mediation. See Ex. 1 \P 6 (Decl. K. Wong).

WHEREAS, the parties believe that mediation would be more productive with the benefit of the Court's ruling on Roblox Corporation's motion to dismiss, as well as further discovery and expert disclosures pursuant to the Court's case management order (Dkt. 87). *See* Ex. 1 ¶ 7 (Decl. K. Wong).

WHEREAS, extension of the private mediation deadline would not impact any other deadline in this case (Dkt. 87). *See* Ex. 1 ¶ 8 (Decl. K. Wong).

NOW, THEREFORE, the Parties, through their respective counsel, stipulate as follows and jointly apply for an order approving said stipulation:

1. The parties' deadline to complete private mediation is extended to February 7, 2025.

IT IS SO STIPULATED.

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2	Dated: August 15, 2024	COOLEY LLP
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4		/s/ Kyle C. Wong Kyle C. Wong
5		Attorney for Defendant ROBLOX CORPORATION
6		Robbon com chamile.
7	Dated: August 15, 2024	WEITZ & LUXENBERG, PC
8		
9		/s/ James J. Bilsborrow James J. Bilsborrow
10		700 Broadway New York, NY 10003
11		Telephone: (212) 558-5500 jbilsborrow@weitzlux.com
12		Counsel for Plaintiffs
13 14		
15	ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3) I, Kyle C. Wong, attest that concurrence in the filing of this document has been obtained from the other signatory. Executed on August 15, 2024, in San Francisco, California.	
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19		/s/ Kyle C. Wong
20		Kyle C. Wong
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W		JOINT STIP. TO EXT. MEDIATION DEADLINE

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JOINT STIP. TO EXT.

MEDIATION DEADLINE
CASE NO. 3:23-CV-04146-VC

1	[PROPOSED] ORDER
2	PURSUANT TO STIPULATION, IT IS SO ORDERED THAT:
3	• The deadline to complete private mediation in this matter is extended to February 7,
4	2025.
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6	Dated:
7	Hon. Vince Chhabria United States District Judge
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